

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No.: 1:19-CR-25-02

Hon.: ROBERT J. JONKER  
CHIEF U.S. DISTRICT JUDGE

MOHAMED SALAT HAJI,

Defendant,

**MOTION FOR  
DOWNWARD VARIANCE**

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Daniel R. Fagan  
Daniel R. Fagan & Associates, P.C.  
Defense Counsel  
429 Turner Avenue NW  
Grand Rapids MI 49504  
P: (616) 224-2564  
[fagandrlaw@gmail.com](mailto:fagandrlaw@gmail.com)

Clay M. West  
Christopher M. O'Connor  
Assistant U.S. Attorney  
330 Ionia Avenue NW Ste 501  
Grand Rapids MI 49503  
P: (616) 456-2404  
[Clay.M.West@usdoj.gov](mailto:Clay.M.West@usdoj.gov)  
[Christopher.OConnor@usdoj.gov](mailto:Christopher.OConnor@usdoj.gov)

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NOW COMES Defendant, Mohamed Salat Haji, by and through his counsel of record, Daniel R. Fagan & Associates, P.C. by Daniel R. Fagan and does hereby move this Court pursuant to 18 U.S.C. § 3553(a) and other authority for a downward variance from the advisory guidelines range.

This motion is supported by the accompanying Sentencing Memorandum and Brief in Support of Motion for Downward Variance.

Dated: September 15, 2021

Respectfully submitted,

/s/ Daniel R. Fagan  
Daniel R. Fagan (P39735)  
Attorney for Defendant